



U.S. Department of Justice

United States Attorney
District of New Jersey
Civil Division

PHILIP R. SELLINGER
UNITED STATES ATTORNEY

John F. Basiak Jr.
Assistant United States Attorney
Deputy Chief, Civil Division

402 East State Street, Room 430
Trenton, NJ 08608
john.basiak@usdoj.gov

main: (609) 989-2190
direct: (609) 858-0309
fax: (609) 989-2275

April 19, 2024

Via ECF

Hon. Cathy L. Waldor, U.S.M.J.
United States District Court
Martin Luther King Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

**Re: *Pergament & Cepeda LLP v. SBA*, Civil Action No. 23-cv-21632
30-Day Extension of Answer Deadline with Consent**

Dear Judge Waldor:

This Office represents the U.S. Small Business Administration (“SBA”) in the above-referenced matter involving SBA’s acceleration of an Economic Injury Disaster Loan issued to Plaintiffs. We write with the consent of Plaintiffs’ counsel to respectfully request a 30-day extension of SBA’s time answer, move, or otherwise respond to the complaint. Our current answer deadline is April 22. If the Court grants our request, our new deadline would be May 22. This is our second extension request to the Court. We also previously obtained a two-week Clerk’s extension under Local Civil Rule 6.1(b).

Good cause exists to grant this extension request because the parties are continuing to negotiate a possible resolution. Most recently, on April 10, SBA conveyed general settlement terms to Plaintiffs’ counsel, and Plaintiffs are actively considering SBA’s proposal and have indicated an intent to respond shortly.

If this proposal is acceptable to Your Honor, we respectfully request that you “so order” this letter and have the Clerk’s Office file it on the docket. Thank you very much for your consideration of this request.

Respectfully submitted,

PHILIP R. SELLINGER
United States Attorney

By: /s/ John F. Basiak Jr. _____
JOHN F. BASIAK JR.
TASHA M. BRADT
Assistant United States Attorneys
Attorneys for the SBA

cc: Avi Frisch (counsel for Plaintiffs)